

GIA N. MARINA
Nevada Bar No. 15276
CLARK HILL PLLC
3800 Howard Hughes Drive, Suite 500
Las Vegas, Nevada 89169
E-mail: gmarina@clarkhill.com
Telephone: (702) 862-8300
Facsimile: (702) 862-8400
Attorney for Defendant
Equifax Information Services LLC

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

DONNA TSANG,

Plaintiff,

vs.

EXPERIAN INFORMATION SOLUTIONS,
INC.; JPMORGAN CHASE BANK, N.A.;
MERRICK BANK CORPORATION; MRS
BPO, L.L.C. dba MRS ASSOCIATES; FAIR
SQUARE FINANCIAL GROUP, LLC dba
OLLO CARD SERVICES; PREMIER
BANKCARD, LLC; COLORADO
DEPARTMENT OF LABOR AND
EMPLOYMENT; THE OHIO DEPARTMENT
OF JOB AND FAMILY SERVICES; CENTER
FOR EMPLOYMENT SECURITY
EDUCATION AND RESEARCH; CREDIT
ONE BANK, N.A.; U.S. SMALL BUSINESS
ADMINISTRATION OFFICE OF DISASTER
ASSISTANCE; and EQUIFAX
INFORMATION SERVICES, LLC;

Defendants.

Case No. 2:22-cv-00572-GMN-BNW

**JOINT MOTION FOR EXTENSION OF
TIME FOR DEFENDANT EQUIFAX
INFORMATION SERVICES LLC TO
FILE ANSWER**

SECOND REQUEST

Defendant Equifax Information Services LLC (“Equifax”) has requested an extension of time to answer, move or otherwise respond to the Complaint in this matter, to which Plaintiff has no opposition. Accordingly, pursuant to LR IA 6-2, IT IS HEREBY STIPULATED AND AGREED to by and among counsel, that Defendant Equifax Information Services LLC’s time to answer,

1 move or otherwise respond to the Complaint in this action is extended from June 1, 2022 through
2 and including **July 1, 2022**. The request was made by Equifax so that the parties may have
3 additional time to engage in settlement discussion, and Plaintiff approves. This stipulation is filed
4 in good faith and not intended to cause delay.

5 Respectfully submitted, this 27th day of May, 2022.

6
7 CLARK HILL PLLC

8 By: /s/Gia N. Marina
9 Gia N. Marina
10 Nevada Bar No. 15276
11 3800 Howard Hughes Pkwy,
12 Suite 500
13 Las Vegas, NV 89169
14 Tel: (702) 862-8300
15 Fax: (702) 862-8400
16 Email: gmarina@clarkhill.com
17 *Attorney for Defendant Equifax Information*
18 *Services LLC*

No opposition

/s/Gerardo Avalos
Michael Kind, Esq.
Nevada Bar No. 13903
KIND LAW
8860 South Maryland Parkway, Suite 106
Las Vegas, NV 89123
Phone: (702) 337-2322
Fax: (702) 329-5881
Email: mk@kindlaw.com

George Haines, Esq.
Nevada Bar No. 9411
Gerardo Avalos, Esq.
Nevada Bar No. 15171
HAINES & KRIEGER, LLC
8985 S. Eastern Ave., Suite 350
Henderson, NV 89123
Phone: (702) 880-5554
Fax: (702) 385-5518
Attorneys for Plaintiff

21
22 IT IS SO ORDERED:

23 
24 _____
United States Magistrate Judge

25 DATED: May 31, 2022
26
27
28

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing has been served this 27th day of May, 2022, via CM/ECF, upon all counsel of record:

By: /s/ Gia N. Marina
Gia N. Marina
Nevada Bar No. 15276
3800 Howard Hughes Pkwy, Suite 500
Las Vegas, NV 89169
Tel: (702) 862-8300
Fax: (702) 862-8400
Email: gmarina@clarkhill.com